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Mr. James Saric, Remedial Project Manager  
USEPA Region 5  
77 West Jackson Boulevard (SR-6J)  
Chicago, IL 60604-3507

ARCADIS  
10559 Citation Drive  
Suite 100  
Brighton  
Michigan 48116  
Tel 810.229.8594  
Fax 810.229.8837  
www.arcadis-us.com

Subject:

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
Supplemental Remedial Investigations/Feasibility Studies Monthly Progress Report  
Area 1 – Morrow Dam to Plainwell Dam (May 2008)

INDUSTRIAL

Dear Jim:

Attached is the 15<sup>th</sup> monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Supplemental Remedial Investigation/Feasibility Study (SRI/FS) – Area 1. This progress report is submitted as per Paragraph 37 of the February 2007 Administrative Settlement Agreement and Order on Consent (AOC) for Remedial Investigations/Feasibility Studies (Docket No. V-W-07-C-864), as well as Section 7.1 of the associated Statement of Work (SOW). If you have any questions, please do not hesitate to contact me.

Date:

June 16, 2008

Contact:

Michael J. Erickson, P.E.

Phone:

810.225.1924

Email:

michael.erickson@  
arcadis-us.com

Our ref:

B0064539.00014 #2

Sincerely,

ARCADIS

Michael J. Erickson, P.E.  
Associate Vice President

Attachments

Copies:

Michael Berkoff, USEPA  
Sam Chummar, USEPA  
Michael Ribordy, USEPA  
Paul Bucholtz, MDEQ (with Attachment A)  
Jeff Keiser, CH2M HILL (with Attachment A)  
J. Michael Davis, Esq., Georgia-Pacific Corporation  
Mellonie Fleming, Esq., Georgia-Pacific Corporation  
David Guier, Millennium Holdings, LLC  
Suda Arakere, Millennium Holdings, LLC  
Paul Montney, P.E., Georgia-Pacific Corporation  
L. Chase Fortenberry, P.G., Georgia-Pacific Corporation  
Mark Brown, Ph.D., Georgia-Pacific Corporation

**MONTHLY PROGRESS REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/  
KALAMAZOO RIVER SUPERFUND SITE SRI/FS  
AREA 1 (MORROW DAM TO PLAINWELL DAM)**

**REPORT #15, MAY 2008**

**PREPARED BY ARCADIS  
JUNE 16, 2008**

**ON BEHALF OF THE KALAMAZOO RIVER STUDY GROUP (KRSG)**

**SUBMITTED TO**

**JAMES SARIC, REMEDIAL PROJECT MANAGER  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (USEPA)**

**Monthly Progress Report for the Allied Paper, Inc./Portage Creek/  
Kalamazoo River Superfund Site SRI/FS – Area 1**

**REPORT #15, MAY 2008**

**Significant Developments and Activities during the Period, Including Actions Undertaken  
Pursuant to the AOC and SOW**

- On May 5, ARCADIS transmitted to USEPA the Peer Review Scope of Work and the Charge to the Peer Review Panel (see Section 1.2.1.3 of the SOW). USEPA approved the Charge to the Peer Review Panel on May 6.
- On May 5, KRSG submitted a revised draft Risk Assessment Framework (RAF) to USEPA for approval.
- On May 6, USEPA forwarded to ARCADIS a copy of CH2M HILL's comments on the Plainwell No. 2 Dam Area investigation plan.
- On May 6, USEPA and ARCADIS participated in a conference call to discuss the revised and expanded draft investigation plan for the Plainwell No. 2 Dam Area.
- On May 6, ARCADIS submitted the Peer Review Charge and Supporting Materials to the Peer Review Panel.
- On May 7, USEPA approved the revised and expanded draft investigation plan for the Plainwell No. 2 Dam Area.
- On May 7, ARCADIS forwarded to USEPA the sampling locations and draft access letter for the upcoming Plainwell No. 2 Dam Area sampling.
- On May 7, ARCADIS forwarded to CDM the surface water data file from the Area 1 SRI Phase 1 Data Report.
- On May 8, ARCADIS sent out property access requests for Plainwell No. 2 Dam Area to local landowners.
- On May 9, MDEQ forwarded to ARCADIS its comments on the Multi-Area Feasibility Study (FS) documents.
- On May 13 and 14, the Peer Review Panel met for delivery of the Charge to the Peer Review Panel and a site tour.
- On May 15, USEPA transmitted to the Peer Review Manager comments from Jim Chapman (USEPA) as a follow up to the May 13 and 14 meeting.

**Monthly Progress Report for the Allied Paper, Inc./Portage Creek/  
Kalamazoo River Superfund Site SRI/FS – Area 1**

**REPORT #15, MAY 2008**

- On May 16, ARCADIS forwarded to the Peer Review Panel members a copy of MSU's presentation titled "Overview of Studies Conducted by MSU on the Kalamazoo River", MDEQ's presentation titled "Summary of Final Revised BERA", and a CD containing NOAA's Query Manager database.
- On May 21, USEPA transmitted to the Peer Review Manager questions from MDEQ regarding MSU's studies based on MSU's May 13 presentation to the Peer Review Panel.
- On May 21, USEPA approved the Ecological Risk Studies Peer Review SOW.
- On May 29, ARCADIS forwarded to USEPA the proposed SRI Phase 2 sampling plan for Portage Creek sediment core collection.
- Throughout May, the KRSG, USEPA and MDEQ discussed the disposal of historical archived sediment cores from Area 1. The KRSG awaits resolution of this issue.
- The KRSG awaits USEPA's response to the letter requesting USEPA's data usability determination for existing data for purposes of the SRI/FS, which was submitted to USEPA on August 27, 2007.
- The KRSG awaits USEPA's comments on the Multi Area FS documents (Section 1.2.2 of the SOW) and the Candidate Technologies and Testing Needs Technical Memorandum (Section 4.1 of the SOW), which were submitted to USEPA on February 22.
- The KRSG awaits USEPA's approval of the Conceptual Site Model (CSM), which was submitted to USEPA on April 18.
- The KRSG awaits USEPA's approval of the Data Management Plan (DMP), which was submitted to USEPA on April 28.
- The KRSG awaits USEPA's approval of the proposed SRI Phase 2 sampling plan for Portage Creek sediment core collection, which was submitted to USEPA on May 29.

**Data Collected and Field Activities Conducted During the Period**

- In May, ARCADIS collected water column samples every other day at the upstream and downstream locations related to the Former Plainwell Impoundment Time-Critical Removal Action (TCRA). Table A summarizes the collected samples that were sent to TestAmerica Laboratories, Inc. for analysis. This sampling is discussed in Section 3.4.5 of the Area 1 SRI/FS Work Plan.
- On May 20, ARCADIS forwarded to USEPA the schedule for upcoming Plainwell No. 2 Dam Area sampling.

**Monthly Progress Report for the Allied Paper, Inc./Portage Creek/  
Kalamazoo River Superfund Site SRI/FS – Area 1**

**REPORT #15, MAY 2008**

- During the week of May 19, ARCADIS performed the following activities regarding the Plainwell No. 2 Dam Area sampling: mobilization, established and checked survey control, installed and surveyed staff gauges, and staked sediment transects.
- During the week of May 26, ARCADIS staked out sampling locations in the Plainwell No. 2 Dam Area.

**Laboratory Data Received During the Period**

- In May, ARCADIS received laboratory data for the surface water samples collected between April 12 and May 16 (sample delivery groups [SDGs] TCRA35, TCRA37, TCRA39, TCRA41, TCRA43 and TCRA44). Table A presents a list of the samples for which data were received. The July 2008 monthly report will present the validated surface water data for these samples.

**Problems**

- None.

**Actions Taken to Correct Problems**

- None.

**Developments Anticipated During the Next Two Reporting Periods**

- In June, ARCADIS personnel are scheduled to perform the following activities related to the Plainwell No. 2 Dam Area: probe sediment, select sediment sample locations with USEPA, collect top-of-bank and floodplain soil samples, perform bank profile survey, and perform habitat assessment.
- In June, USEPA and KRSG will continue to correspond as necessary with the Peer Review Manager as needed to address questions from the panel (see Section 1.2.1.3 of the SOW).
- In June, ARCADIS will continue to work on the development of Phase 2 sampling plans for Area 1, as described in the Area 1 SRI/FS Work Plan.
- In July, ARCADIS will forward to USEPA the validated data for the surface water samples collected between March 27 and April 10 (SDGs TCRA32 and TCRA 33).

**Kalamazoo River Study Group**  
**Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site**  
**Supplemental Remedial Investigations/Feasibility Studies**  
**Monthly Report #15, May 2008**

**Table A — Upstream/Downstream Surface Water Sampling — Plainwell TCRA — Samples**  
**Collected and Data Received in May 2008**

Sample ID	Sample Date	Data Received	Sample Delivery Group	Sample Location
K30797	4/12/2008	5/7/2008	TCRA35_SDSP	10th Street Bridge
K30798	4/12/2008	5/7/2008	TCRA35_SDSP	Farmer Street Bridge
K30799	4/14/2008	5/7/2008	TCRA35_SDSP	Farmer Street Bridge
K30800	4/14/2008	5/7/2008	TCRA35_SDSP	10th Street Bridge
K30801	4/16/2008	5/7/2008	TCRA35_SDSP	Farmer Street Bridge
K30802	4/16/2008	5/7/2008	TCRA35_SDSP	10th Street Bridge
K30803	4/18/2008	5/13/2008	TCRA37_SDSP	Farmer Street Bridge
K30804	4/18/2008	5/13/2008	TCRA37_SDSP	10th Street Bridge
K30805	4/20/2008	5/13/2008	TCRA37_SDSP	Farmer Street Bridge
K30806	4/20/2008	5/13/2008	TCRA37_SDSP	10th Street Bridge
K30807	4/22/2008	5/13/2008	TCRA37_SDSP	Farmer Street Bridge
K30808	4/22/2008	5/13/2008	TCRA37_SDSP	10th Street Bridge
K30809 <sup>2</sup>	4/24/2008	5/13/2008	TCRA37_SDSP	Farmer Street Bridge
K30810 <sup>2</sup>	4/24/2008	5/13/2008	TCRA37_SDSP	10th Street Bridge
K30811	4/26/2008	5/20/2008	TCRA39_SDSP	Farmer Street Bridge
K30812	4/26/2008	5/20/2008	TCRA39_SDSP	10th Street Bridge
K30813	4/28/2008	5/20/2008	TCRA39_SDSP	Farmer Street Bridge
K30814	4/28/2008	5/20/2008	TCRA39_SDSP	10th Street Bridge
K30815 [K30816]	4/30/2008	5/20/2008	TCRA39_SDSP	Farmer Street Bridge
K30817 <sup>1</sup>	4/30/2008	5/20/2008	TCRA39_SDSP	10th Street Bridge
K30818	5/2/2008	5/22/2008	TCRA41_SDSP	Farmer Street Bridge
K30819	5/2/2008	5/22/2008	TCRA41_SDSP	10th Street Bridge
K30820	5/4/2008	5/22/2008	TCRA41_SDSP	Farmer Street Bridge
K30821	5/4/2008	5/22/2008	TCRA41_SDSP	10th Street Bridge
K30822	5/6/2008	5/22/2008	TCRA41_SDSP	Farmer Street Bridge
K30823	5/6/2008	5/22/2008	TCRA41_SDSP	10th Street Bridge
K30824	5/8/2008	5/23/2008	TCRA43_SDSP	Farmer Street Bridge
K30825	5/8/2008	5/23/2008	TCRA43_SDSP	10th Street Bridge
K30826	5/10/2008	5/23/2008	TCRA43_SDSP	Farmer Street Bridge
K30827	5/10/2008	5/23/2008	TCRA43_SDSP	10th Street Bridge
K30828	5/12/2008	5/23/2008	TCRA43_SDSP	Farmer Street Bridge
K30829	5/12/2008	5/23/2008	TCRA43_SDSP	10th Street Bridge
K30830	5/14/2008	5/30/2008	TCRA44_SDSP	Farmer Street Bridge
K30831	5/14/2008	5/30/2008	TCRA44_SDSP	10th Street Bridge
K30832	5/16/2008	5/30/2008	TCRA44_SDSP	Farmer Street Bridge
K30833	5/16/2008	5/30/2008	TCRA44_SDSP	10th Street Bridge
K30834	5/18/2008	NR	--	Farmer Street Bridge
K30835	5/18/2008	NR	--	10th Street Bridge
K30836	5/20/2008	NR	--	Farmer Street Bridge
K30837	5/20/2008	NR	--	10th Street Bridge
K30838	5/22/2008	NR	--	Farmer Street Bridge
K30839	5/22/2008	NR	--	10th Street Bridge

See Notes on Page 2.

**Kalamazoo River Study Group**  
**Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site**  
**Supplemental Remedial Investigations/Feasibility Studies**  
**Monthly Report #15, May 2008**

**Table A — Upstream/Downstream Surface Water Sampling — Plainwell TCRA — Samples Collected and Data Received in May 2008**

Sample ID	Sample Date	Data Received	Sample Delivery Group	Sample Location
K30850 [K30840] <sup>1</sup>	5/24/2008	NR	--	Farmer Street Bridge
K30841	5/24/2008	NR	--	10th Street Bridge
K30842	5/26/2008	NR	--	Farmer Street Bridge
K30843	5/26/2008	NR	--	10th Street Bridge
K30844	5/28/2008	NR	--	Farmer Street Bridge
K30845	5/28/2008	NR	--	10th Street Bridge
K30846	5/30/2008	NR	--	Farmer Street Bridge
K30847	5/30/2008	NR	--	10th Street Bridge

**Notes:**

NR - Data not received as of May 31, 2008.

All samples analyzed by TestAmerica Laboratories, Inc. for PCBs and TSS.

Duplicate samples are in brackets.

<sup>1</sup>MS/MSD performed on this sample.

<sup>2</sup>Due to laboratory error, there is no sample for this day.